Remarks

Claims 1, 2, 5, 8, 10-18, 21, 23-32, 35, 38, 40-49 are pending but stand rejected. Claims 3, 4, 6, 7, 9, 19, 20, 22, 33, 34, 36, 37, and 39 have been cancelled. Claims 5, 8, 18, 21, and 35 have been amended. In view of the amendments and following remarks, the applicants respectfully ask for the Examiner's thoughtful reconsideration.

CLAIM REJECTIONS – 35 USC §102

Claims 1, 3-7, 9-11, 31, 33-37, and 39-41 were rejected under 35 U.S.C. §102 as being anticipated by US Pub 2003/0065918 to Willey. It is initially noted that Claims 3, 4, 6, 7, 9, 33, 34, 36, 37, and 39 were cancelled and will not be addressed,

Claim 1 is directed to a method for publishing a PIN for use in establishing a pairing with a printing device and recites the following:

1. the printing device generating the PIN in response to a local PIN request; and
2. the printing device printing the PIN.

Willey describes a handset 100 that includes a speaker 140 and a display160. Willey describes that, to complete a pairing process with a headset 300, a user verifies that each digit displayed on the handset's display 160 is the same as a digit announced via speaker 140. Willey, paragraph [0042].

Addressing Claim 1, the Examiner cites Willey, paragraph [0042] and states:

> In rejecting this claim, examiner interprets the claimed 'printing device' as a device containing hardware capable of forming a printed image on paper or any other media. This definition is documented in applicant's specification. Following this interpretation, a device capable of printing an image on a display screen, such as that taught by the Willey reference, successfully reads on the current claim.

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The Examiner is confusing the term printing with the term displaying. Willey teaches displaying digits on the display 160 of a handset 100. Regardless of the definition of printing device provided in the specification, Claim 1 recites a method step that involves one device generating and then *printing* a PIN and not simply forming an image. Assuming for a moment Willey's display 160 is a media on which an image can be formed, digits are displayed on display 160 and not printed.

Merriam-Webster defines the verb "print" as follows:

> **2 a :** to make a copy of by impressing paper against an inked printing surface or by an analogous method <*printing* columned pages> <*print* bank notes> -- often used with *up* **b :** to perform or cause to be performed all or some of the operations necessary to the production of (as a publication, a piece of printed matter, a picture) <*print* greeting cards> <*print* an edition of a newspaper> **c :** to impress (as wallpaper or cloth) with a design or pattern <*print* cloth with linoleum blocks> <this air-dried tub-sized paper is easy to *print -- Graphic Arts Monthly*> : impress (a pattern or design) on something <*printed* gay foliage on sheer linen> **d :** to publish in print <"all the news that's fit to *print*" -- *New York Times*>

In the context of the present application, "printing" can mean (a) making a copy of by impressing paper against an inked printing surface or by an analogous method or (b) performing or causing to be performed all or some of the operations necessary to the production of a piece of printed matter. Willey's display of digits on the electronic display 160 of a handset 100 is not printing. Willey's display is not a "piece of printed matter" nor is it a copy formed by pressing paper against an inked printing surface. Instead, Willey's display 160 is some form of a display screen, not unlike a computer monitor, on which digits can be electronically formed.

While the Examiner is allowed to make the broadest interpretation of the Claim terms, that interpretation must be reasonable. Equating a printing device printing the PIN with a handset's displaying of digits on an electronic display 160

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is not reasonable.

As such Wiley fails to teach or suggest a method in which a printing device generates and then prints a PIN. For at least this reason, Claim 1 is patentable over Willy as is Claim 2 which depends from Claim 1.

Claim 5 is directed to a method for initializing a device pairing and recites the following:

1. generating a PIN in response to a local PIN request;
2. printing the PIN;
3. receiving a connection request with PIN data; and
4. generating a link key using the PIN data, the link key used for device pairing.

Claim 5 has been amended to recite printing the PIN rather than publishing the PIN. As with Claim 1, Willey fails to teach or suggest printing a PIN. For at least the same reasons Claim 1 is patentable, so are Claims 5 and Claim 8, 10, 11, and 12 which depend from Claim 5.

Claim 31 is directed to a system for publishing a PIN for use in establishing a pairing with a printing device and recites components operable to implement the method of Claim 1. In particular, Claim 31 recites a publishing module that is operable "to direct a print engine for the printing device to print the PIN." As with Claim 1, Willey fails to teach or suggest printing a PIN or causing a PIN to be printed. For at least the same reasons Claim 1 is patentable, so are Claim 31 and Claim 32 which depends from Claim 31.

Claim 35 is directed to a system for initializing a device pairing and recites components operable to implement the method of Claim 5. In particular, Claim 35 recites a "publishing module operable to print the PIN." As with Claims 1 and 5, Willey fails to teach or suggest printing a PIN or causing a PIN to be printed.

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For at least the same reasons Claims 1 and 5 are patentable, so are Claim 35 and Claim 38 and 40-42 which depends from Claim 35.

CLAIM REJECTIONS – 35 USC §102

Claims 13, 26, and 43 were rejected under 35 U.S.C. §102 as being anticipated by USPN 6,748,195 issued to Phillips.

Claim 13 is directed to a method for establishing a pairing between a claimant device and a verifying device and recites the following:

1. generating a PIN in response to a local PIN request made to the verifying device;
2. instructing the verifying device to print the PIN;
3. receiving from the claimant device a connection request, the connection request including PIN data;
4. determining whether a link key exists for the verifying device;
5. if a link key exists:
    a. rejecting the connection request if the verifying device is not multi-claimant enabled;
    b. rejecting the connection request if the verifying device is multi-claimant enabled with restricted access and the claimant device is not approved;
6. otherwise, upon a determination that the PIN data is valid, generating a link key from the PIN data to establish a pairing between the claimant device and the verifying device.

As amended, Claim 13 recites "instructing the verifying device to print the PIN." This is not taught or suggested by Phillips. As with Claim 1, Willey fails to teach or suggest printing a PIN or causing a PIN to be printed. For at least the same reasons Claim 1 is patentable, so are Claim 13 and Claim 15 which

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depends from Claim 13.

Claim 26 is directed to a computer readable medium having instructions for implementing the method of Claim 13. For at least the same reasons Claim 13 is patentable, so are Claim 26 and Claim 28 which depends from Claim 26.

Claim 43 is directed to a system having components for implementing the method of Claim 13. For at least the same reasons Claim 13 is patentable, so are Claim 43 and Claim 45 which depends from Claim 26.

CLAIM REJECTIONS – 35 USC §103

Claims 2, 8, 12, 32, 38, 42, and 49 were rejected under 35 U.S.C. §103 as being unpatentable over Willey.

Claim 2 depends from Claim 1 and recites identifying a local request to print a test page as the local PIN request and that printing the PIN comprises printing a test page that includes the PIN. Addressing Claim 2, the Examiner states:

> The Willey reference does not explicitly teach that the authenticating or authenticated device is specifically a printer. Bluetooth enabled printers are well known in the art (see Nessimi. US Patent No. 7,142,814). It would have been obvious to apply the functionalities and capabilities of the devices in the Willey reference to Bluetooth enabled printers at the time of the invention. As taught by the Willey reference, prior to establishing a PIN, the two devices are communicating in an insecure manner. Thus it would be advantageous communicate potentially private information to the printer for printing. For this reason, it would be obvious to first print a test page. The PIN would be included on the test page so that the user can ensure that both devices are utilizing the same PIN.

Simply because a Bluetooth printers are known is not sufficient. Claim 2 recites identifying a local request to print a test page as the local PIN request. Nessimi includes a discussion that a given piconet 206 may include a printer 208.

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Nessimi, col. 6, lines 20-30. Teaching away from Claim , Nessimi teaches that pairing occurs automatically without the use of a PIN by pressing a physical button or by powering a device off and on. Nessimi, Abstract.

Neither Willey, nor Pessimi teaches or suggests identifying a local request to print a test page as the local PIN request and then printing a test page that includes the PIN. For at least these additional reasons, Claim 2 is patentable over Willey.

Claim 8 depends form Claim 5 and, like Claim 2, recites that the local PIN request is a local request to print a test page, and that printing comprises printing a test page that includes the PIN. For at least the same reasons Claim 2 is patentable, so is Claim 5.

Claim 12 depends from Claim 5. For at least the same reasons Claim 5 is patentable, so is Claim 12.

Claim 14 has been cancelled.

Claims 15 and 16 depend from Claim 13. For at least the same reasons Claim 13 is patentable, so are Claim 15 and 16.

Claim 17 recites a method that includes generating a PIN in response to a local request to print a test page made to the printing device and instructing the printing device to print a test page that includes the PIN. As explained with respect to Claims 1 and 2 above, Willey neither teaches nor suggests printing a PIN or causing a PIN to be printed. For at least the same reasons Claim 1 is patentable, so is Claim 17.

Claim 18 is directed to a computer readable medium. The medium includes instructions for generating a PIN in response to a local PIN request and printing publishing the PIN. As explained with respect to Claims 1 and 2 above,

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Willey neither teaches nor suggests printing a PIN or causing a PIN to be printed. For at least the same reasons Claim 1 is patentable, so is Claim 18.

Claims 19 and 20 have been cancelled.

Claim 21 depends form Claim 18 and, like Claim 2, recites that the local PIN request is a local request to print a test page, and that printing comprises printing a test page that includes the PIN. For at least the same reasons Claim 2 is patentable, so is Claim 21.

Claim 22 has been cancelled.

Claims 23-25 depend from Claim 18. For at least the same reasons Claim 18 is patentable so are Claims 23-25.

Claim 27 has been cancelled.

Claim 28 and 29 depend from Claim 26. For at least the same reasons Claim 26 is patentable, so are Claim 28 and 29.

Claim 30 is directed to a computer readable medium. That medium includes instructions for generating a PIN in response to a local request to print a test page, the request being made to a printing device and instructing the printing device to print a test page that includes the PIN. As explained with respect to Claims 1 and 2 above, Willey neither teaches nor suggests printing a PIN or causing a PIN to be printed. For at least the same reasons Claim 1 is patentable, so is Claim 30.

Claim 32 depends from Claim 31, and like Claim 2, recites that the local PIN request is a local request to print a test page and that the publishing module is operable to identify the request, to direct the PIN module to generate the PIN,

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and to direct the print engine to print a test page that includes the PIN. For at least the same reasons Claim 2 is patentable, so is Claim 32.

Claim 38 depends from Claim 35 and, like Claim 2, recites that the local PIN request is a local request to print a test page and that the publishing module is operable to direct a print engine to print a test page that includes the PIN. For at least the same reasons Claim 2 is patentable, so is Claim 38.

Claim 42 depends from Claim 35. For at least the same reasons Claim 35 is patentable, so is Claim 42.

Claim 44 has been cancelled.

Claims 45 and 46 depend from Claim 43. For at least the same reasons Claim 43 is patentable, so are Claims 45 and 46.

Claim 47 recites a system that includes a PIN module operable to generate a PIN in response to a local request to print a test page made to the printing device and a publishing module operable to instruct the printing device to print a test page that includes the PIN. As explained with respect to Claims 1 and 2 above, Willey neither teaches nor suggests printing a PIN or causing a PIN to be printed. For at least the same reasons Claim 1 is patentable, so is Claim 47.

Claim 49 depends from Claim 48 and, like Claim 2, recites that the means for identifying is a means for identifying a local request to print a test page and that the means for directing is a means for directing the print engine to print a test page that includes the PIN. For at least the same reasons Claim 2 is patentable, so is Claim 49.

Conclusion

In view of the foregoing remarks and amendments, Applicant respectfully submits that Claims 1, 2, 5, 8, 10-18, 21, 23-32, 35, 38, 40-49 define allowable subject matter. The Examiner is requested to indicate the allowability of all claims in the application and to pass the application to issue.

Respectfully submitted,
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